STANDARD INSPECTION REPORT OF A GAS OPERATOR FIELD AUDIT

FIELD AUDIT

Unless otherwise noted, all code references are to 49CFR Part 192.
If an item is marked Unsatisfactory, Not Applicable, or Not Checked, an explanation must be included in this report.

Operator: ENERGY MAINTENANCE SERVICES GROUP 1, LLC	Operator ID#: 32239
Inspection Date(s): 11/28/2012 (Half)	Man Days: 0.5
Inspection Unit: ENERGY MAINTENANCE SERVICES GROUP 1 - Reliant Energy	
Location of Audit: Neoga	
Exit Meeting Contact: Mike Vollmering, O&M Manager Energy Maintenance Services (EMS)	
Inspection Type: Standard Inspection - Field Audit	
Pipeline Safety Representative(s): Jim Watts	
Company Representative to Receive Report: Mike Vollmering **Company Representative's Email Address: mvollmering@emsglobal.net**	

Headquarters Address Information:	5391 Bay Oaks Drive Pasadena, TX 77505 Emergency Phone#: Fax#:	
Official or Mayor's Name:	Mike Vollmering Phone#: (713) 963-7652 Email: mvollmering@emsglobal.net	
Inspection Contact(s)	**Title**	**Phone No.**
Mike Vollmering	O and M Manager - Energy Maintenance Services	(713) 963-7652
Gil Smith	Plant Manager	

CUSTOMER METER & REGULATOR		**Status**
Category Comment: *The following items do not apply because the transmission line is not utilized to supply any customers other than the natural gas generation facility.*		
192.353(a)	Is the customer meter and regulator installed in a readily accessible location and protected from corrosion and other damage, including if installed outside a building, vehicular damage that may be anticipated?	**Not Applicable**
192.355(b)(1)	Is the customer regulator vent rain and insect resistant?	**Not Applicable**
192.355(b)(2)	Is the customer regulator vent located where gas from the vent escapes freely into the atmosphere and away from building openings?	**Not Applicable**

192.355(b)(3)	Is the vent protected from damage caused by submergence in areas of flooding?	**Not Applicable**
192.357(a)	Is the customer meter and regulator installed to minimize anticipated stresses upon connecting piping?	**Not Applicable**
192.357(d)	Is a customer regulator that might release gas vented to the outside atmosphere?	**Not Applicable**
192.359(a)	Is the meter operating pressure within the allowable limits of the meter case rating?	**Not Applicable**
192.365(a)	Is the service line valve upstream of the regulator or meter?	**Not Applicable**
192.365(c)	Is the underground service line valve located in a curb box or standpipe that allows for ready operation?	**Not Applicable**
192.727(d)	When service to the customer has been discontinued has the proper method been utilized to prevent unauthorized usage?	**Not Applicable**
CATHODIC PROTECTION		**Status**
192.463(a)	Is the applicable cathodic protection criteria contained in Appendix D of this part being followed?	**Satisfactory**
192.465(a)	Were pipe to soil readings taken?	**Satisfactory**

General Comment:

Pipe to soils were performed at the following test stations on the transmission pipeline and indicate adequate levels of cathodic protection are being applied. The potentials observed are inline with the potential levels reported in the May 2012 pipe to soil potential testing report.

Road Crossing at 100E -1.5 volts
West side of CN Railroad -1.4 volts
Inlet riser inside
Generation Plant -1.4 volts

192.465(b)	Were rectifier installations inspected?	**Not Applicable**

General Comment:

No rectifiers are utilized to provide cathodic protection to the transmission pipeline. The pipeline is protected using sacrificial anodes.

192.465(a)	Were isolated mains/services tested?	**Not Applicable**

General Comment:

There are no isolated segments of piping on the transmission pipeline. It is protected as a single unit and is monitored annually for levels of cathodic protection.

192.465(c)	Were critical/non critical bonds tested?	**Not Applicable**

General Comment:

There are no critical or non critical bonds on the pipeline.

192.467(a)	Is electrical isolation provided by use of insulated meter spud, valve, union, or flange?	**Satisfactory**

General Comment:

Electrical isolation is achieved using insulated flanges at the take point and at the end of the pipeline located at the generation plant pig receiver/launcher header.

192.467(c)	Were casings installations tested for electrical isolation?	**Not Applicable**

General Comment:

There are no casing installations on the pipeline.

192.479(a)	Is the above ground piping coated or painted as required?	**Satisfactory**

General Comment:

The pig launcher, riser for the connection to NGPL piping located at the take point and the pig receiver and header piping located at the generation plant are the only segments of above ground piping. They were observed having been previously painted to adequately protect against atmospheric corrosion. The coating interface zones on the riser piping were observed being adequately bonded to prevent the entrance of moisture under the coating.

192.479(c)	Is the pipeline free of corrosion or pitting?	**Satisfactory**

General Comment:

The inspection detected no areas of active corrosion or pitting on the above ground sections of piping.

DAMAGE PREVENTION		**Status**
192.614	Does the operator have a valid notification of planned excavation activities?	**Not Checked**

General Comment:

No utility locates were reviewed as part of this inspection due to there being no indications of recent locating activities.

265.40(a)	Did the operator complete the locating activities in the specified timeframe?	**Not Checked**

General Comment:

No utility locates were reviewed as part of the field inspection.

192.614(c)(5)	Were temporary markings made in accordance with the operator's Operation and Maintenance Manual?	**Not Applicable**

General Comment:

No indications of prior markings were observed during the field audit. The operator's procedures require the use of paint and or flags to mark the approximate location of the pipeline depending on the ground conditions. A majority of the pipeline is on property/ground utilized for agricultural crop production and there are only 3 road/highway crossings and a railroad crossing on the pipeline.

192.707(a)(1)	Are line markers placed and maintained as close as practical over each buried main and transmission line located at each crossing of a public road and railroad?	**Satisfactory**

General Comment:

Line markers were observed present at both sides each road crossing and at the railroad crossing. The road crossings were at 100E, Interstate I57, Route 45 and one railroad crossing at the CN R.R.

192.707(a)(2)	Are line markers placed and maintained as close as practical over each buried main and transmission line located wherever necessary to identify the location of the transmission line or main to reduce the possibility of damage or interference?	**Satisfactory**

General Comment:

Line markers were observed present at one location west of 100E in the farm field on a property line. Marker placement would easily allow one to follow the pipeline route using line of sight when the crops are out of the fields.

192.707(c)	Are line markers placed and maintained as close as practical over each main and transmission line located above ground?	**Satisfactory**

General Comment:

The perimeter fence at the Trunkline take point was posted with a line marker and one was placed just outside the fence on the northwest side of the take point installation.

192.707(d)(1)	Do the operator's line markers contain the following information: The following must be written legibly on a background of sharply contrasting color on each line marker: The word "Warning," "Caution," or "Danger" followed by the words "Gas (or name of gas transported) Pipeline" all of which, except for markers in heavily developed urban areas, must be in letters at least 1 inch (25 millimeters) high with ¼ inch (6.4 millimeters) stroke?	**Satisfactory**

General Comment:

Proper wording, letter stroke and size was observed being utilized on the pipeline markers located at the road and railroad crossings reviewed during the audit.

192.707(d)(2)	Do the operator's line markers contain the following information: The following must be written legibly on a background of sharply contrasting color on each line marker: The name and phone number (including area code) of the operator where the operator can be reached at all times?	**Satisfactory**

General Comment:

The line markers present have both the EMS 1-866-497-2284 number and Reliant Plant number posted at the pipeline crossings.

PRESSURE LIMITING AND REGULATING DEVICES (MECHANICAL)		**Status**
192.739(a)(4)	Was each pressure limiting station, relief device (except rupture discs), and pressure regulating station and its equipment subjected at intervals not exceeding 15 months, but at least once each calendar year, to inspections and tests to determine that it is properly installed and protected from dirt, liquids, or other conditions that might prevent proper operation.?	**Not Applicable**

General Comment:

There is no pressure regulating equipment on the pipeline. The transmission line has a higher MAOP than the supplier's pipeline. Trunkline Pipeline utilizes a flow controller to adjust the flow volumes requested when the generation plant is online. At the time of the inspection, Trunkline was indicating an operating pressure of 684 psig. The operator's transmission pipeline has an MAOP of 1000 psig.

192.317(b)	Is each above ground transmission line or main protected from accidental damage by vehicular traffic or other similar causes?	**Satisfactory**

General Comment:

Location's where above ground piping is present, is away from vehicular traffic and located within locked fenced enclosures.

192.741(a),192.741(c)	Were telemetering and/or recording gauges inspected for abnormally high or low pressure indications?	**Satisfactory**

General Comment:

Pressures indicated on the control panel are received from the suppliers SCADA system and were observed indicating a delivery pressure of 684 psig which is well within the operator's pipeline MAOP of 1000 psig.

192.743(a)	Is overpressure protection provided on the pipeline down stream of the take point?	**Not Applicable**
General Comment:		
Overpressure protection is not required because the pipeline has a higher MAOP than the supplier's pipeline.		
192.199(d)	Did the pressure relief or pressure limiting devices inspected to determine if the support was made of noncombustible material?	**Not Applicable**
General Comment:		
No relief or pressure limiting device is required on the transmission piping system due to them having a higher MAOP than their supplier.		
192.199(e)	Did the pressure relief or pressure limiting devices inspected to determine if the discharge stacks, vents, or outlet ports were designed to prevent accumulation of water, ice, or snow, and located where gas can be discharged into the atmosphere without undue hazard?	**Not Applicable**
General Comment:		
No relief or pressure limiting device is required on the transmission piping system due to the operator having a higher pipeline MAOP than the supplier.		
192.199(h)	Was each valve, designed to isolate the system under protection from its source of pressure, secured to prevent unauthorized operation of any stop valve that will make the pressure relief valve or pressure limiting device inoperative?	**Satisfactory**
General Comment:		
The valves located at the take point and at the generation station are located within locked fenced enclosures and the valves were observed being locked to prevent unauthorized operation.		
VALVE MAINTENANCE		**Status**
192.747(a)	Were the valves inspected accessible?	**Satisfactory**
General Comment:		
All valves located at the generation plant and at the Trunkline take point are accessible within the locked fenced enclosure.		
ODORIZATION OF GAS		**Status**
Category Comment:		
The operator's transmission pipeline transports unodorized gas and is located in a class one location. Odorization is not required due to the pipeline being transmission and is located in a class one location.		
192.625(a)	Was the odor intensity level readily detectable at or below 1/5th LEL?	**Not Applicable**
192.625(e)	Was the Odorization equipment and tank levels inspected?	**Not Applicable**
192.625(f)	Was the operator's equipment calibrated as required?	**Not Applicable**
TRANSMISSION		**Status**
192.179(b)(1)	Are transmission valves protected from tampering or damage?	**Satisfactory**
General Comment:		
Above ground valves located at the take point and at the generation plant were locked to prevent unauthorized operation and are located within locked fenced enclosures.		

STANDARD INSPECTION REPORT OF A GAS OPERATOR FIELD AUDIT

FIELD AUDIT

Unless otherwise noted, all code references are to 49CFR Part 192.
If an item is marked Unsatisfactory, Not Applicable, or Not Checked, an explanation must be included in this report.

192.745(a)	Were the valves inspected accessible?	**Satisfactory**
General Comment:		
The pipeline only has above ground valves. They were observed being accessible and are located within a locked fenced enclosure. The operator wheels on the valves were observed being secured with a locking device to prevent unauthorized operation.		
192.719(a)	Is pre-tested transmission pipe inventory maintained for use in an emergency?	**Not Applicable**
General Comment:		
The operator does not maintain an emergency supply of pre-tested piping.		
MARKING OF MATERIAL		**Status**
192.63(a)	Does the operator's components and pipe contain the required markings?	**Satisfactory**
General Comment:		
Valves and flanges located at the pig launchers and receivers were marked with pressure ratings.		
OPERATOR QUALIFICATION		**Status**
Was a PHMSA Form 15 Operator Qualification Field Inspection Protocol Form completed?		**No**
General Comment:		
No covered tasks were observed being performed during the field audit so no PHMSA form 15 was completed.		

STANDARD INSPECTION REPORT OF A GAS OPERATOR FIELD AUDIT

FIELD AUDIT

Unless otherwise noted, all code references are to 49CFR Part 192.
If an item is marked Unsatisfactory, Not Applicable, or Not Checked, an explanation must be included in this report.